



# DIOCESE OF OAKLAND

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June 10, 1993

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JUN 14 1993

FCC MAIL ROOM

Ms. Donna R. Stacey  
Secretary, Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: Docket 93-106

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JUN 14 1993  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Dear Ms. Stacey:

The ITFS channels were set aside for educational use and in 1968 our corporation took advantage of those channels and established an education network throughout the San Francisco Bay Area. The service has developed and expanded over the years and some financial hardships have been experienced. We were delighted when the FCC authorized ITFS systems to lease surplus air time, after the educational quota had been met, in order to obtain some income relief.

Now, however, the proposed rule changes appear to be nothing more than a poorly disguised way for commercial interests to obtain three more ITFS channels and we are sure that it is not the intent of the FCC.

I have expressed my concern before about the dangers of the FCC leaning in favor of the wireless cable group and again want to express my real concern over these proposed changes. Finally, as a director of a large and complex ITFS operation I find it extremely difficult to accept the fact that any legitimate educational organization could operate on one channel only. I suspect that this proposal has come about due to concerns of operational costs of the wireless cable industry. In fact, an executive of one wireless cable operation said to my General Manager, "If the wireless cable company builds the ITFS system at its expense, why should it not have three of the system's channels?"

I am confident that the FCC in its wisdom will not in any way allow more channels to be moved away from the ITFS section.

Sincerely,

John S. Cummins  
Bishop of Oakland

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